

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JEANETTE ROSA,

CASE NO. 12-cv-03030-JS-ETB

Plaintiff,

-against-

(Proposed)

JOINT DISCOVERY PLAN

VITAL RECOVERY SERVICES, INC.
and DOES 1 through 10, inclusive.

Defendants.
-----X

Pursuant to Judge Boyle's June 20, 2012 order, the parties submit the following proposed discovery plan in preparation for the **November 16, 2012** initial conference:

1. Motion to Amend Pleadings or Join Parties: January 16, 2013
2. Service of Initial Discovery Demands: December 7, 2012
3. Deadline to initiate motion for summary judgment process: April 8, 2013
4. Date for submission of pre-trial order: April 30, 2012
5. Discovery completion date: March 18, 2013

/s/ Amir J. Goldstein
Amir J. Goldstein, Esq.
Attorney for Plaintiff
166 Mercer Street, 3A
New York, New York 10012
(212) 966- 5253
(866) 228- 9194 fax

/s/ Hilary Korman
Hilary Korman, Esq.
Attorney for Defendant
Mel S. Harris & Associates, LLC.
5 Hanover Square, 8th Floor
(212) 517-4900 ext. 3309
(212) 660-1018 fax

So ORDERED:

U.S.M.J.